

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TELECOM BUSINESS SOLUTION, LLC,  
LATAM TOWERS, LLC, and AMLQ HOLDINGS  
(CAY) LTD.,

*Petitioners,*

v.

TERRA TOWERS CORP. and TBS  
MANAGEMENT, S.A.,

*Respondents,*

No. 22-cv-1761-LAK

TERRA TOWERS CORP., TBS MANAGEMENT,  
S.A., and DT HOLDINGS, INC.

*Cross-Petitioners,*

v.

TELECOM BUSINESS SOLUTION, LLC,  
LATAM TOWERS, LLC, and AMLQ HOLDINGS  
(CAY) LTD.,

*Cross- Respondents.*

**MOTION TO WITHDRAW AS COUNSEL**

1. Pursuant to Local Rule 1.4, the undersigned law firm of Carey Rodriguez LLP, hereby moves to withdraw as counsel of record for Respondents/Cross-Petitioners Terra Towers Corp., TBS Management S.A., and DT Holdings, Inc. (together, “Respondents”).

2. Undersigned counsel seeks to withdraw as counsel of record for Respondents due to irreconcilable differences that have arisen between them. Counsel has conferred with Respondents and received permission to be relieved as counsel in the pending matters.

3. The matter is currently on appeal with minimal active proceedings in the lower court.

4. On August 2, 2024, the Second Circuit Court of Appeals granted undersigned counsel’s withdrawal in the appeal of the instant case. Then, on August 30, 2024, attorney Rodney Quinn Smith of GST LLP entered his appearance substituting the undersigned counsel.<sup>1</sup>

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<sup>1</sup> *Telecom Business Solution, LLC v. Terra Towers Corp.*, Second Circuit Court of Appeals Docket #: 23-7312. DE 68, 74.

5. Undersigned Counsel further asserts a retaining lien until outstanding fees are satisfied and reserves the right to enforce a charging lien on any recovery obtained in this matter to secure payment for services rendered.

6. No party will be prejudiced by the granting of this Motion and cause exists pursuant to Local Rule 1.4 to enter an Order withdrawing the appearances of Carey Rodriguez LLP, on behalf of Respondents.

WHEREFORE, the law firm of Carey Rodriguez LLP, respectfully requests that this Court enter an Order granting this motion to withdraw.

Dated: November 4, 2024

Respectfully Submitted,

**CAREY RODRIGUEZ, LLP**

By: /s/ Juan J. Rodriguez

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*\* Admitted Pro Hac Vice*

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Lewis. A. Kaplan

United States District Judge

Southern District of New York

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 4, 2024, a true and correct copy of the foregoing document was electronically filed, which will serve a Notice of Filing on counsel of record, via the Court's e-service system.

By: /s/ Juan J. Rodriguez  
Juan J. Rodriguez \*

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